

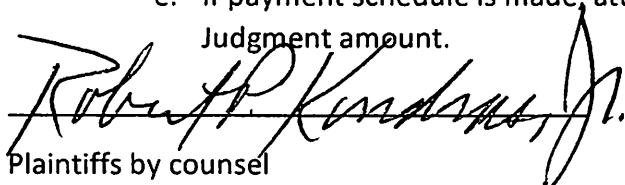
Memorandum of Agreement

2:13cv378 Thomas Thacker v Halter Vegetation

2:14 cv 176 Ladonna Flores v Halter

March 5, 2016

1. Each Plaintiff agrees to accept and the defendants will execute agreed Judgments in the Total Amount of \$75,000 distributed as follows:
 - a. Thomas Thacker-- \$29,500 in compensation and attorney fees of \$22,500
 - b. Ladonna Flores--- \$15,500 in compensation and attorney fees of \$7,500
2. The parties will execute a settlement agreement under which the following terms will apply:
 - a. Plaintiffs' counsel will agree not to seek any execution under said judgments so long as the following payment schedule is complied with:
 - i. Defendants will pay \$10,000 on April 1, 2015, May 1, 2015 and June 1, 2015, for a total of \$30,000.
 - ii. Defendants will pay \$5,000 on the first day of the next 6 months for an additional total of \$30,000.
 - b. Upon completion of the payments as scheduled, the plaintiff will show extinguished the agreed Judgment.
 - c. Both plaintiffs will sign a release of all claims arising out of their employment.
 - d. Plaintiffs will agree not to publish in any public media the amounts of the Judgments, but may disclose them as required by law.
 - e. If payment schedule is made, attorney fees of \$15,000 will be waived from the Judgment amount.


Plaintiffs by counsel


Defendant


Vegetum Mangum